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Attorneys for Creditor BETA Healthcare Group

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA

In re)	Case No. 17-13797
TULARE LOCAL HEALTHCARE)	
DISTRICT,)	REQUEST FOR SPECIAL NOTICE
)	
Debtor.)	
_____)	

Pursuant to Bankruptcy Rules 2002 and 9010, creditor BETA Healthcare Group (“BETA”) requests that all matters that must be noticed to creditors and any other parties in interest whether sent by the Court, the Debtor, the Trustee or any other party in the case, be served upon the following:

Gerald N. Sims, Esq.
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PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statements of affairs, operating reports, schedule of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party-in-interest in this case, including BETA with respect

1 to (a) the debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim
2 an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the
3 debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment
4 or other conduct by BETA.

5 **PLEASE TAKE FURTHER NOTICE**, that BETA intends that neither this Request nor any
6 later appearance, pleading, claim or suit shall waive (1) the right of BETA to have final orders in
7 noncore matters entered only after de novo review by a District Judge; (2) the right of BETA to trial by
8 jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case;
9 (3) the right of BETA to have the District Court withdraw the reference in any matter subject to
10 mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or
11 recoupments to which BETA is or may be entitled under agreements, in law, in equity, or otherwise, all
12 of which rights, claims, actions, defenses, setoffs, and recoupments BETA expressly hereby preserves
13 and asserts in these cases.

14 **PLEASE TAKE FURTHER NOTICE**, that BETA DOES NOT grant authority to the
15 undersigned to be its agent for service of process with respect to any adversary proceeding in the case.
16 BETA expressly states that the undersigned has no authority to accept service of process of any
17 adversary proceeding in this case under, inter alia, Bankruptcy Rule 7004 and that any summons or
18 complaint must be served directly upon BETA.

19 Dated: October 2, 2017

PYLE SIMS DUNCAN & STEVENSON
A Professional Corporation

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22 By: /s/ Gerald N. Sims
Gerald N. Sims, Attorneys for Creditor,
23 BETA Healthcare Group
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